

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

GURINDER SINGH BAINS, as Personal  
Representative of the ESTATE of  
JASWINDER SINGH, deceased, HAR-  
PREET SINGH and his wife, DILPREET  
KAUR, and LAKHWINDER KAUR,

Plaintiffs,

v.

AMERICAN TACTICAL, INC., ANTHONY  
DICHARIO, JOSEPH CALABRO,  
SCHMEISSER GMBH, and 365 PLUS  
D.O.O.

Defendants.

Civil Action No. 2:24-cv-03970-BHH

Jury trial requested

**STIPULATION**

The plaintiffs, GURINDER SINGH BAINS, as Personal Representative of the ESTATE of JASWINDER SINGH, deceased, HARPREET SINGH and his wife, DILPREET KAUR, and LAKHWINDER KAUR, and defendants, AMERICAN TACTICAL, INC., ANTHONY DICHARIO, and JOSEPH CALABRO, hereby agree and stipulate to the following pre-answer schedule:<sup>1</sup>

Plaintiffs intend to file a Second Amended Complaint to address issues related to the transfer of this case to South Carolina on or before August 30, 2024;

The parties do not waive any claims or defenses by entry of this stipulation including all substantive, jurisdictional, and procedural defenses.

Dated: August 19, 2024

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<sup>1</sup> Defendants Schmeisser GMBH and 365 PLUS D.O.O. are foreign entities, have not been served, and have not appeared in this action.

Respectfully submitted,

<p><u>/s/ Christiaan A. Marcum</u>  Christiaan Marcum (Fed. I.D. #7556)  Elizabeth Middleton Burke (Fed. I.D. #7466)  <b>ROGERS PATRICK</b>  <b>WESTBROOK &amp; BRICKMAN, LLC</b>  1037 Chuck Dawley Blvd., Bldg. A  Mount Pleasant, SC 29464  (843) 727-6522 Telephone  cmarcum@rpwb.com  bburke@rpwb.com</p> <p>Leslie Mitchell Kroeger, Esq. (pro hac vice to be filed)  Poorad Razavi, Esq. (pro hac vice to be filed)  Rachael Flanagan, Esq. (pro hac vice to be filed)  COHEN MILSTEIN SELLERS &amp; TOLL  11780 U.S. Highway One, Suite N500  Palm Beach Gardens, FL 33408  T: (561) 515-1400  lkroeger@cohenmilstein.com  prazavi@cohenmilstein.com  rflanagan@cohenmilstein.com</p> <p>and</p> <p>Jay Chaudhuri, Esq. (pro hac vice to be filed)  COHEN MILSTEIN SELLERS &amp; TOLL  407 North Person Street  Raleigh, NC 27601  jchaudhuri@cohenmilstein.com</p> <p>and</p> <p>Douglas N. Letter, Esq.  <i>(pro hac vice to be filed)</i>  Philip H. Bangle, Esq.  <i>(pro hac vice to be filed)</i>  BRADY UNITED AGAINST GUN VIOLENCE  840 First Street NE, Ste. 400  Washington, DC 20002  pbangle@bradyunited.org  <a href="mailto:dletter@bradyunited.org">dletter@bradyunited.org</a>  <i>Counsel for Plaintiffs</i></p>	<p><u>/s/ Michael Montgomery</u>  Michael Montgomery  ROBINSON GRAY  2151 Pickens Street  Suite 500  PO Box 11449 (29211)  Columbia, SC 29201  Direct 803.231.7833  mmontgomery@robinsongray.com</p> <p>and</p> <p>Christopher Renzulli, Esq.  <i>(pro hac vice to be filed)</i>  Jeffrey Malsch, Esq.  <i>(pro hac vice to be filed)</i>  Justin Gottuso, Esq.  <i>(pro hac vice to be filed)</i>  RENUZZI LAW FIRM, LLP  One North Broadway, Suite 1005  White Plains, NY 10601  T: (914) 285-0700  crenzulli@renzullilaw.com  jmalsch@renzullilaw.com  jgottuso@renzullilaw.com</p> <p><i>Counsel for Defendants</i>  <i>American Tactical, Inc., Anthony DiChario,</i>  <i>and Joseph Calabro</i></p>
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**CERTIFICATE OF SERVICE**

I, Christiaan A. Marcum, attorney for the plaintiffs, hereby certify that on the 19<sup>th</sup> day of August 2024, a true copy of the foregoing was filed through the ECF System and sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be served by first-class mail, postage prepaid, upon anyone indicated as a non-registered participant.

/s/ Christiaan A. Marcum